



# BOROUGH OF OAKMONT

(412) 828-3232

767 FIFTH STREET

OAKMONT, PA 15139-1524

POLICE (412) 826-1578

FAX (412) 828-3479

[www.oakmontborough.com](http://www.oakmontborough.com)

**MEMBERS OF COUNCIL**  
LINDSAY OSTERHOUT, PRESIDENT  
NANCY RIDE, VICE PRESIDENT  
DAVID BRANKLEY  
JOHN ARNOLD  
TRACEY HOLST  
JAMIE LEONARDI  
AMANDA PAGNOTTA

**BOROUGH MANAGER**  
SCOT E. FODI

**ASSISTANT BOROUGH MANAGER**  
PHYLLIS J. ANDERSON

**SOLICITOR**  
KATE DIERSEN

**MAYOR**  
SOPHIA FACAROS

**CHIEF OF POLICE**  
MICHAEL J. FORD

via email: [R3\\_UIC\\_Mailbox@epa.gov](mailto:R3_UIC_Mailbox@epa.gov)

August 17, 2022

Ryan Hancharick  
Source Water & UIC Section  
U.S. EPA Region 3

**Re: Proposed Permit PAS2D702BALL, Sedat #4A  
Oakmont Borough Council Official Response.**

Mr. Hancharick,

During a recent public meeting of Oakmont's Borough Council, a speaker presented information regarding a proposed injection well in Plum Borough, a municipality abutting Oakmont.

On behalf of Council, we request that proposed Permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial Disposal Injection Well, Sedat #4A, located in Plum Borough be **denied** due to our concerns that the Pennsylvania DEP may be understaffed to adequately monitor the conditions of existing wells in the region.

Permit me to elaborate on our concerns.

We understand, based on information provided to Oakmont that the Applicant, Penneco Environmental Solutions, LLC, (hereinafter, "Penneco") has several violations and an unresolved permit application at adjacent injection wells, directly related to the current permit application.

A condition of Permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection stipulates the following:

"...The permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons."

During the last known Pennsylvania Department of Environmental Protection (DEP) file review of the Sedat #3A injection well (July 22, 2021), inspectors indicated that the *"Well operator failed to notify the DEP within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution."*



Oakmont Borough is a Certified Silver Community by Sustainable Pennsylvania

Since then, the DEP has not completed additional file reviews or site inspections of Sedat #3A. Unfortunately, it appears the opportunity to adequately monitor the conditions of disposal injection wells—even more than once per year—is a challenge to the DEP due to staffing. Anecdotally, Sedat 1A monitoring well has not been inspected since November, 2020.

Furthermore, Oakmont Borough Council obtained information that soon after Penneco received a Disposal Injection Well Permit from both the EPA and DEP, the DEP subsequently issued five (5) violations to Penneco for poor construction practices at the Sedat #3A well in August, 2020.

Based on DEP's necessary enforcement actions against Penneco as it has not met the conditions of its existing Disposal Injection Well Permit (Sedat #3A), Penneco should not be granted an additional permit for an additional Disposal Injection Well Permit (Sedat #4A).

An interesting condition of the permit for Sedat #4A reads as follows:

“...The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.”

**DEP has not yet granted the transfer of use permit for the Sedat #2A well.** It is still classified as an extraction well. It would appear to be premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

Finally, the Injection Disposal Well Permit for Sedat #3A identifies Sedat #1A as a necessary monitoring well to ensure that Sedat #3A was properly functioning. As stated before, Sedat #3A has not been inspected since November, 2020, which was the well's first inspection after it was plugged in May, 2020 and granted a transfer of use permit.

Given the outline of violations publicly available for review and DEP's infrequent and irregular inspection schedule, the Department unfortunately does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning.



Again, Oakmont Borough urges the EPA to **deny** this permit application. On behalf of Oakmont Borough Council and the Honorable Mayor of Oakmont,

Respectfully,

Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.

Scot E. Fodi,  
Borough Manager  
BOROUGH of OAKMONT

C: Borough Council  
Sophia Facaros, Mayor

*See Next Page for additional distributions*



Oakmont Borough is a Certified Silver Community by Sustainable Pennsylvania

I certify that a true copy of the foregoing document was distributed to the following individuals or entities:

Governor Tom Wolf  
Lieutenant Governor John Fetterman  
United States Senator Bob Casey  
United States Senator Pat Toomey  
United States Representative Connor Lamb  
Pennsylvania Senator Jay Costa  
Pennsylvania Senator Jim Brewster  
Pennsylvania Representative Carrie DelRosso  
Pennsylvania Representative Tony DeLuca  
Pennsylvania Representative Brandon Markosek  
Allegheny County Executive Rich Fitzgerald  
Allegheny County Council Member Bethany Hallum  
Allegheny County Council Member Samuel DelMarco, III  
Allegheny County Council Member Nicholas Futules  
Allegheny County Council Member Michelle Naccaarati-Chapkis  
Plum Borough Council  
Harry Schlegel, Mayor, Plum Borough  
Pennsylvania Department of Environmental Protection, Environmental Quality Board  
PWSA  
The Municipal Authority of Oakmont Borough

Dated this 17<sup>th</sup> day of August 2022

Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.  
Non-responsive based on revised scope.



Oakmont Borough is a Certified Silver Community by Sustainable Pennsylvania